

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

PATRICK PURSLEY,	)	
	)	Case No. 18 C 50040
Plaintiff,	)	
	)	Judge: Philip G. Reinhard
v.	)	
	)	Magistrate Judge: Lisa A. Jensen
THE CITY OF ROCKFORD, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT GREG HANSON'S MOTION TO JOIN DEFENDANTS' MOTION TO  
DISMISS AMENDED COMPLAINT**

NOW COMES Defendant GREG HANSON, by and through his attorney, Michael F. Iasparro of Hinshaw & Culbertson LLP, and for his Motion to Join Defendants' Motion to Dismiss Amended Complaint, states as follows:

1. On March 15, 2019, Defendants City of Rockford, James Barton, Ron Gallardo, John Genens, Charlene Getty, Jeff Houde, Sam Pobjecky and Mark Schmidt jointly filed their Motion to Dismiss Plaintiff's Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6). (Dkt. 55).

2. As of the date of the filing of the Motion to Dismiss, Defendant Greg Hanson had not yet been served.

3. Defendant Hanson has now been served, and is represented by Attorney Michael F. Iasparro, who represents five other Defendants who jointly filed the Motion to Dismiss (Ron Gallardo, John Genens, Jeff Houde, Sam Pobjecky, and Mark Schmidt).

4. Defendant Hanson has a similar basis to move to dismiss the Amended Complaint as the other Defendants who have so moved. In particular, Defendant Hanson is only identified

in two paragraphs of the 129 paragraph Amended Complaint. In particular, the only allegations against Defendant Hanson are as follows:

a. The Amended Complaint states that Greg Hanson was a Rockford police officer that participated in the Ascher murder investigation. (Dkt. 49 at ¶ 10).

b. In addition, the Amended Complaint states that Defendant Hanson searched Plaintiff's then-girlfriend's apartment along with several other officers, and that "[t]hese Defendants [without further elaboration] reported recovering, among other things, a 9-millimeter Taurus handgun, as well as articles of Plaintiff's clothing and a pair of black combat boots." (Dkt. 49 at ¶ 41).

5. There are no other allegations in the Amended Complaint specific to Defendant Hanson, though presumably Defendant Hanson is lumped in with the nineteen individually named defendants referred to as either "Defendant Officers" or "Defendants" throughout the Amended Complaint.

6. As with the other moving Defendants, to the extent Plaintiff's Amended Complaint makes conclusory allegations against "Defendant Officers" or "Defendants," without distinction or differentiation, the claims against them (and Defendant Hanson) are not pled with enough factual particularity to make those claims plausible.

7. The Motion to Dismiss has been stayed pending service on all defendants, and no briefing schedule has been entered on the motion. Allowing Defendant Hanson to join the pending Motion to Dismiss will promote judicial efficiency and allow the Motion to be ruled upon in consolidated rather than piecemeal fashion.

WHEREFORE, Defendant GREG HANSON respectfully requests leave to join the Motion to Dismiss Amended Complaint (Dkt. 55), and for such further relief as this Court deems just and necessary.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

/s/ Michael F. Iasparro

Michael F. Iasparro

Michael F. Iasparro  
Hinshaw & Culbertson LLP  
100 Park Avenue  
P.O. Box 1389  
Rockford, IL 61105-1389  
Telephone: 815-490-4900  
Facsimile: 815-490-4901  
miasparro@hinshawlaw.com